

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MARYLAND**

UNITED STATES :
:
v. : No. 22-CR-125
:
RODNEY GAINES :
:

RENEWED MOTION TO CONTINUE

Pro se defendant Rodney Gaines hereby renews his motion to continue his trial date. In support of this motion Mr. Gaines submits the following:

1. Since the Court denied Mr. Gaines' last motion to continue filed August 22, the government has produced the following evidence:
 - a. August 23 – Supplemental witness information (2 GB)
 - b.
 - c. August 26 – LEO emails and texts (12 folders, 208 files)
 - d. August 26 – witness supplemental information
 - e. August 28 – supplemental information on 2 witnesses
 - f. August 28 – ring camera videos of alleged murder scene
 - g. August 30 – previously lost communications from Trooper Ward
 - h. August 30 – Supplemental FBI reports, IAD files, K9 reports
 - i. September 1 – BPD BWC, additional IAD file, emails, FBI and police reports

- j. September 1 – additional materials on cooperating witnesses
2. During the August 29 hearing the government stated the two videos of the murder scene had been already provided in the discovery related to the murder. However, a review of discovery 8 did not include the ring camera videos.
3. On August 30 the government announced that it had found what it claimed to be the complete content of the missing Trooper Ward hard drive. However, the files consist of two videos of scrolling text messages and not the text messages themselves. It is extremely difficult to review this material because the video plays much faster than a person can read and it is almost impossible to click the “pause” and “play” buttons quick enough to review every message without missing any. The videos appear to have been produced in March 2024.
4. Stand by counsel and Mr. Gaines are reviewing these messages it is already clear that they contain highly relevant information.
5. Moreover, it also appears that at least Mr. Wilson was being encouraged by law enforcement to contact Mr. Gaines and relay information about his defense despite the fact that he was by that time represented. This is potentially an important legal issue that Mr. Gaines requires time to research

and brief. Mr. Gaines' standby counsel can share these materials with chambers.

6. Although we haven't finished our review of these materials we are filing this motion now to bring it to the Court's attention immediately.
7. Throughout this case the government got nine continuances based in part on the need to continue producing discovery that were granted. It is not fair that the government is now releasing large amounts of often unwieldy materials at the last minute while objecting to even a single continuance for Mr. Gaines to have time to review it.

Respectfully submitted,

/s/ Rodney Gaines

Rodney Gaines, pro se

CERTIFICATE OF SERVICE

I certify that I have served this document through ecf.

Respectfully submitted,

/s/ Rodney Gaines

Rodney Gaines, pro se